## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

KRIS DEDOMINIC,
Plaintiff,

CASE NO.

VS.

TRANSUNION RENTAL SCREENING SOLUTIONS, INC.,
Defendant.

## TRANS UNION RENTAL SCREENING SOLUTIONS, INC.'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union Rental Screening Solutions, Inc. ("TURSS") hereby removes the subject action from the Court of Common Pleas of Montgomery County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania, on the following grounds:

- 1. Plaintiff Kris Dedominic served Trans Union on March 5, 2019, with a Notice To Defend ("Notice") and Complaint ("Complaint") filed in the Court of Common Pleas of Montgomery County, Pennsylvania. Copies of the Notice and Complaint are attached hereto as **Exhibit A** and **Exhibit B**, respectively. No other process, pleadings or orders have been served on Trans Union.
- 2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the "FCRA"). *See* Complaint ¶¶ 1, 4-19.
- 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

- Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Court 4. of Common Pleas of Montgomery County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania.
- 5. Notice of this removal will promptly be filed with the Court of Common Pleas of Montgomery County Pennsylvania and served upon all adverse parties.

WHEREFORE, Defendant Trans Union Rental Screening Solutions, Inc., by counsel, removes the subject action from the Court of Common Pleas of Montgomery County, Pennsylvania, to this United States District Court, Eastern District of Pennsylvania.

Respectfully submitted,

Casey B/Green, Esq.

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Counsel for Defendant TransUnion Rental

Screening Solutions, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a co	opy of the foregoing has been filed electronically
on the $\frac{75^{\text{M}}}{\text{day of }}$ day of $\frac{\text{Max}}{\text{day}}$ , 2019. Notice	of this filing will be sent to the following parties
by operation of the Court's electronic filing sys	stem. Parties may access this filing through the
Court's electronic filing.	
None.	
The undersigned further certifies that a following parties via First Class, U.S. Mail, pos	true copy of the foregoing was served on the
following parties via First Class, U.S. Mail, pos	tage prepaid, on the S day of 1
2019, properly addressed as follows:	
for Plaintiff Kris Dedominic	
Vicki Piontek, Esq.	
951 Allentown Road	
Lansdale, PA 19446	

Casey B. Green, Esq.

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